

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

**PERFECTING CHURCH, MARVIN
WINANS, and CYNTHIA FLOWERS**

Plaintiffs,

Case No. 2:09-cv-13493

Hon. Gerald E. Rosen

vs.

**ROYSTER, CARBERRY, GOLDMAN
& ASSOCIATES, INC., MARTIN ROYSTER,
SHANNON STEEL, LLOYD BANKS,
TOINE MURPHY, and SHALAC HOLDINGS LLC**

Defendants.

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PLAINTIFFS' PRELIMINARY WITNESS LIST

Plaintiffs Perfecting Church, Marvin Winans, and Cynthia Flowers, by their attorneys Clark Hill PLC, respectfully submit the following preliminary list of witnesses that may be called to provide testimony in this matter:

1. Marvin Winans;
2. Cynthia Flowers;
3. Agents, employees, keepers of records, and other representatives of the Perfecting Church;
4. Martin Royster;
5. April Royster;
6. Shannon Steel;
7. Lloyd Banks;
8. Toine Murphy;
9. Agents, employees, keepers of records, and other representatives of Royster, Carberry, Goldman & Associates, Inc.;
10. Agents, employees, keepers of records, and other representatives of RCG Financial Group, LLC;
11. Agents, employees, keepers of records, and other representatives of RCG Management, Inc.;
12. Agents, employees, keepers of records, and other representatives of RCG Partners;
13. Agents, employees, keepers of records, and other representatives of Shalac Holdings LLC;
14. Agents, employees, keepers of records, and other representatives of the State of Michigan Department of Energy, Labor and Economic Growth, Office of Financial and Insurance Regulation and/or other government agencies that have investigated this matter;

15. All witnesses identified by any other party to this action, not otherwise objected to by Plaintiffs;

16. Persons and representatives of entities identified during the course of discovery, which is ongoing;

17. Persons identified by Plaintiffs for purposes of rebuttal.

Plaintiffs reserve the right to amend their Witness List as discovery in this matter progresses.

Respectfully submitted,

CLARK HILL PLC

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Attorneys for Plaintiffs

Date: November 10, 2010

CERTIFICATE OF SERVICE

I state that on November 10, 2010, the foregoing paper filed with the Court via the ECF system which will send notification to all attorneys of record.

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